

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

TAYLOR SMITH,
Plaintiff,

v.

**RICE UNIVERSITY, JENNIFER
HUNTER, AND SEIICHI MATSUDA**
Defendants.

§
§
§
§
§
§
§

CIVIL ACTION NO. 4:24-CV-02839

AGREED MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

Defendants Rice University, Jennifer Hunter and Seiichi Matsuda (collectively, “Defendants”) and Plaintiff Taylor Smith, through undersigned counsel, move for the entry of an agreed protective order to facilitate the production of confidential material. The parties seek to protect their legitimate privacy interests regarding records or information that may be sought during this litigation. Plaintiff and Defendants consent to entry of the proposed Protective Order attached to this Motion, pursuant to Fed. R. Civ. P. 26(c).

WHEREFORE, the parties pray that the Court issue the attached Agreed Protective Order.

[signatures on following page]

Respectfully submitted,

/s/ Teresa Valderrama

TERESA VALDERRAMA

State Bar No. 24022500

EMMA BROCKWAY

State Bar No. 24125156

FISHER & PHILLIPS LLP

910 Louisiana Street, Suite 4000

Houston, Texas 77002

(713) 292-0150 Phone

(713) 292-0151 Fax

tvalderrama@fisherphillips.com

ebrockway@fisherphillips.com

ATTORNEYS FOR DEFENDANT

AND

/s/ Leslie N. Oguchi

LESLIE N. OGUCHI

State Bar No. 24081076

OGUCHI LAW

5903 Serrano Terrance Lane

Houston, Texas 77041

(713) 454-6612 Phone

Leslie.oguchi@oguchilaw.com

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

As counsel for Defendants, I hereby certify that during the Rule 26(f) conference and thereafter on the 1st day of November 2024 and on April 4, 2025, I conferred with Plaintiff's counsel regarding the relief requested in this Motion and the form of the proposed Protective Order, and I further certify that the Parties **agree** on the form of the Order and the necessity of its entry.

/s/ Teresa Valderrama
TERESA VALDERRAMA
An Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed on this the 4th day of April, 2025 via the Court's CM/ECF system, which generates a service copy on all enrolled counsel of record.

LESLIE N. OGUCHI
State Bar No. 24081076
OGUCHI LAW
5903 Serrano Terrance Lane
Houston, Texas 77041
Leslie.oguchi@oguchilaw.com

/s/ Teresa Valderrama
TERESA VALDERRAMA